

Margaret M. Fox

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September 2, 2014

Ms. Jocelyn Boyd Chief Clerk and Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia, South Carolina 29210

Re: In the Matter of the ANPI, LLC for a Certificate of Public Convenience and Necessity for Authority to Provide Wholesale Local Exchange Telecommunications Services, including Exchange Access, Statewide, and for its Local Exchange Service Offerings to be Regulated in Accordance with Procedures First Authorized for NewSouth Communications in Order No. 98-165

Docket No. 2014-322-C

Dear Ms. Boyd:

Enclosed for filing on behalf of the South Carolina Telephone Coalition is a Petition to Intervene in the above-referenced matter. A copy of this Petition is being served on interested parties by U.S. Mail.

Please let me know if you have any questions regarding this filing.

Sincerely,

McNAIR LAW FIRM, P.A. Wargare Hu. Fax

Margaret M. Fox

MMF:dc Enclosures McNair Law Firm, P. A. 1221 Main Street Suite 1600

Columbia, SC 29201

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BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2014-322-C

Application of ANPI, LLC for a Certificate of Public)	
Convenience and Necessity for Authority to Provide)	PETITION TO
Wholesale Local Exchange Telecommunications Services,)	INTERVENE
including Exchange Access, Statewide, and for its Local)	
Exchange Service Offerings to be Regulated in Accordance with)	
Procedures First Authorized for NewSouth Communications)	
Communications in Order No. 98-165 in Docket No. 97-467-C)	
)	

The South Carolina Telephone Coalition ("SCTC") respectfully submits the within Petition to Intervene in the above-referenced docket. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

- 1. SCTC is a coalition of incumbent local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record in so far as its interests might appear.
- 3. ANPI, LLC ("ANPI" or "Applicant") seeks authority to provide local exchange services in the State of South Carolina, including rural areas. The service ANPI proposes to provide is described by the Applicant as "local exchange telecommunications services, including exchange access, in the State of South Carolina on a wholesale basis only."

4. The provision of the proposed service by ANPI would impact SCTC members and the rural customers they serve. SCTC, therefore, has a direct and substantial interest in this proceeding and will be affected by its outcome. While SCTC has not fully developed a position on the request at this time, SCTC is concerned that ANPI's service has the potential to adversely impact the availability of affordable local exchange service in SCTC member companies' areas, and SCTC's position is that its participation in this proceeding will aid the Commission in a full and fair consideration and resolution of the request.

5. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

3y:<u>/</u>

M. John Bowen, Jr.

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ATTORNEYS FOR THE SOUTH CAROLINA TELEPHONE COALITION

Columbia, South Carolina September 2, 2014

South Carolina Telephone Coalition Member Companies

Chesnee Telephone Company

Chester Telephone Company, d/b/a TruVista

Comporium, Inc. (f/k/a Rock Hill Telephone Company)

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company, d/b/a Comporium

Home Telephone ILEC, LLC d/b/a Home Telecom

Lancaster Telephone Company, d/b/a Comporium

Lockhart Telephone Company, d/b/a TruVista

McClellanville Telephone Company

Norway Telephone Company

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

Ridgeway Telephone Company, d/b/a TruVista

Sandhill Telephone Cooperative, Inc.

St. Stephen Telephone Company

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company

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Docket No. 2014-322-C

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I, Debra Carlucci, do hereby certify that I have this date served one (1) copy of the S. C. Telephone Coalition's Petition to Intervene in the above-referenced docket upon the following parties causing said copies to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows;

John J. Pringle, Jr., Counsel Adams and Reese, LLP Post Office Box 2285 Columbia, SC 29202

Andrew M. Bateman, Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Shannon Bowyer Hudson, Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Debra Carlucci

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